CHAPTER 5. ALTERNATIVES ANALYSIS

5.1 INTRODUCTION

The California Environmental Quality Act (CEQA), Section 15126.6(a), requires an EIR to "describe a reasonable range of alternatives to a project, or to the location of a project, which could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." This chapter discusses the feasibility of alternatives to the proposed 2045 General Plan Update and corresponding Zoning Code Update (Municipal Code) update (collectively referred to as the project), including a No Project Alternative. The State CEQA Guidelines provide direction for the discussion of alternatives to the proposed project, including the following guidance:

- Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. (Section 15126.6(b))
- The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. (Section 15126.6(d))
- The specific alternative of "no project" shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decisionmakers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. (Section 15126.6(e)(1))
- If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. (Section 15126.6(e)(2))
- When the project is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the "no project" alternative will be the continuation of the existing plan, policy, or operation into the future. Typically this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan. (Section 15126.6(e)(3))
- The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. (Section 15126.6(f))

Given the CEQA mandates listed above, this section: (1) describes the range of reasonable alternatives to the project; (2) examines and evaluates resource issue areas where significant adverse environmental effects have been identified and compares the impacts of the alternatives to those of the proposed project; and (3) identifies the Environmentally Superior Alternative.

5.2 ALTERNATIVES SELECTION

In accordance with the CEQA Guidelines, appropriate alternatives for EIR analysis are those that meet most of the basic project objectives and avoid or substantially lessen any of the significant environmental effects of the proposed project. Consequently, this section reviews the objectives that were identified for the proposed project and summarizes the significant unavoidable environmental effects identified in this EIR.

5.2.1 Project Objectives

As described in Chapter 2, *Project Description*, the Guiding Principles serve as the project objectives of the 2045 General Plan Update and include the following:

Guiding Principles – Our Places

- Respect Atascadero's semi-rural character as the community evolves.
- Facilitate vibrant public spaces that encourage community connections. Support City parks, trails, and facilities that provide access to a variety of recreation experiences.
- Promote investments in downtown that support the needs of local businesses and residents and provide a quality experience for visitors.
- Encourage synergistic commercial and residential uses along the El Camino Real and Morro Road corridors to support long-term viability of commercial spaces.

Guiding Principles – Our People

- Support a culture that is welcoming, inclusive, and based on mutual respect.
- Create and maintain opportunities for people of all income levels and ages to live, work, raise families, and retire in Atascadero.
- Target growth to serve community needs and enhance the quality of life.

Guiding Principles – Our Economy

- Incentivize a mix of business and revenue streams that support a resilient economy.
- Diversify Atascadero's employment opportunities to address the needs of an evolving workforce and attract jobs for all skill levels and income ranges.

Guiding Principles – Our Infrastructure

- Facilitate safe, convenient, and comfortable connections for people of all abilities and in different stages of life.
- Support and maintain efficient and sustainable infrastructure systems.
- Organize public service systems so that all neighborhoods and business districts have access to public services and emergency response.
- Plan and prepare for community safety and resiliency from evolving climate threats, natural, and human-caused hazards.

Guiding Principles – Our Natural Environment

- Integrate Atascadero's natural, historical, and cultural landscapes and resources into planning decisions.

5.2.2 Significant Impacts Resulting from the Proposed Project

Alternatives to be considered under CEQA are those that would avoid or substantially lessen one or more of the significant environmental effects identified during evaluation of the proposed project. Many of the adverse environmental impacts described in Chapter 4, *Environmental Impacts Analysis*, were determined to be less than significant or less than significant with the incorporation of identified mitigation. The following impacts were found to be significant and unavoidable even with the implementation of mitigation measures. This alternatives analysis specifically focuses on alternatives that would avoid or substantially lessen the significant and unavoidable impacts summarized below.

5.2.2.1 Air Quality

- **Impact AQ 1: The project would conflict with an applicable air quality plan (Class 1).** The 2045 General Plan and Zoning Code Update focuses growth in more VMT-efficient areas at higher densities and with more travel options, so it produces less VMT per capita and per employee than the existing General Plan; however, even with this focus on VMT-reducing development and implementation of 2045 General Plan policies, estimated increases in VMT would exceed the Land Use and Climate Innovation (LUCI) recommended thresholds (AMBIENT 2026a). As a result, increases in vehicle miles traveled (VMT) attributable to the 2045 General Plan and Zoning Code Update would be inconsistent with statewide planning and climate change policies and efforts, such as the California Air Resources Board (CARB) Climate Change Scoping Plan. Increases in VMT may result in long-term increases of mobile-source air pollutants not accounted for in the CAP. As a result, long-term increases of regional pollutants and consistency with the San Luis Obispo County Air Pollution Control District (SLOAPCD) Clean Air Plan (CAP) would be considered a potentially significant impact. No feasible mitigation measures have been identified that would further reduce this impact, due to unmitigable contributing factors such as the existing development pattern and geography of the City. As a result, this impact would be considered *significant and unavoidable*. See Section 4.3, *Air Quality, Greenhouse Gas Emissions*, *and Energy* for the full discussion of this potential impact.
- **Impact AQ-2: The project would result in a cumulatively considerable net increase of criteria pollutants for which the project region is non-attainment (Class I).** The 2045 General Plan includes numerous goals, policies, and action items that would help to reduce criteria pollutant emissions commonly associated with construction and operational activities. In addition, the City of Atascadero development review process requires a review of consistency with local and state policies, including SLOAPCD regulations and CEQA. Consistent with existing practices, each new discretionary development project associated with community buildout pursuant with the 2045 General Plan and Zoning Code Update would be reviewed for consistency with these policies to help reduce local and regional impacts. Potentially significant impacts would require implementation of additional project-specific mitigation measures to further reduce project-generated emissions and associated air quality impacts; however, given the region's current nonattainment status and uncertainty regarding the effectiveness of future mitigation for individual development projects, short-term and long-term air quality impacts would be *significant and unavoidable*. See Section 4.3, *Air Quality, Greenhouse Gas Emissions, and Energy* for the full discussion of this potential impact.
- **Impact AQ-3: The project could expose sensitive receptors to substantial pollutant concentrations (Class I).** The 2045 General Plan includes policies that would help to minimize construction-generated fugitive dust associated with future land use development projects and provide buffer areas between industrial and residential land uses that would help to minimize potential exposure to operational toxic air contaminants (TACs). Consistent with the City's current

practices, future discretionary development projects associated with community buildout pursuant to the 2045 General Plan and Zoning Code Update would be evaluated for consistency with SLOAPCD's recommended guidance. In accordance with the SLOAPCD's guidance, future development projects would be evaluated for potential short-term and long-term exposure to localized pollutants, including emissions of criteria pollutants, TACs and other airborne pollutants, such as asbestos, CO, and Coccidioides (valley fever) fungus spores. However, even with consistency with SLOAPCD guidance, it is conceivable that some development projects may be large enough or close enough to a sensitive receptor that applicable project-level significance thresholds would be exceeded. In the event that a significant impact is identified for an individual project, the SLOAPCD-recommended mitigation measures would be required to reduce project-related impacts; however, even with mitigation, it may not be possible to reduce potential emissions of TACs or exposure to localized airborne pollutants and all health-related risks to nearby receptors to levels below the SLOAPCD recommended significance thresholds. As a result, this impact would be *significant and unavoidable*. See Section 4.3, *Air Quality, Greenhouse Gas Emissions, and Energy* for the full discussion of this potential impact.

- **Impact AQ-5: The project would result in cumulatively considerable impacts associated with projected long-term increases in VMT and mobile-source emissions (Class I).** Implementation of the 2045 General Plan would incorporate numerous goals, policies, and actions that would be generally consistent with the SLOAPCD CAP, minimize criteria pollutant emissions, and minimize exposure of sensitive receptors to air pollutant concentrations. However, potential impacts would be cumulatively considerable and *significant and unavoidable*. See Section 4.3, *Air Quality, Greenhouse Gas Emissions, and Energy* for the full discussion of this potential impact.

5.2.2.2 Greenhouse Gas Emissions

- **Impact GHG-1: The project could generate greenhouse gas emissions, either directly or indirectly, that may result in a significant environmental impact and could conflict with applicable plans, policies, or regulations adopted to reduce greenhouse gas emissions (Class I).** Future development associated with community buildout pursuant to the 2045 General Plan and Zoning Code Update would result in long-term increases in operational GHG emissions, primarily from mobile sources, with additional contributions from energy use, waste generation, water use, and area sources. Although the 2045 General Plan policies and mitigation measures identified would reduce GHG emissions relative to existing conditions under the 2025 General Plan, total residential and employment-based VMT would exceed LUCI-recommended thresholds. Because these thresholds are intended to support statewide GHG reduction goals, exceedance of the thresholds indicates that projected reductions in mobile-source GHG emissions would not be fully achieved. As a result, long-term increases in VMT and associated mobile-source emissions would remain the primary contributor to cumulative GHG emissions. Mitigation measures have been identified to incorporate policies into the 2045 General Plan to require an update of the City's Climate Action Plan, implement additional measures for land use development in support of the State's 2045 carbon-neutrality goal, and participate in the San Luis Obispo Council of Governments (SLOCOG) SCS/Regional Blueprint Planning effort. No additional feasible mitigation measures have been identified that would further reduce this impact, due to unmitigable contributing factors such as the existing development pattern and geography of the City. As a result, this impact would be *significant and unavoidable*. See Section 4.3, *Air Quality, Greenhouse Gas Emissions, and Energy* for the full discussion of this potential impact.

- **Impact GHG-2: The project would result in cumulatively considerable greenhouse gas emissions associated with projected increases in VMT and mobile-source emissions and would conflict with applicable State greenhouse gas reduction plans (Class I).** As described under Impact GHG-1, total residential and employment-based VMT would exceed LUCI-recommended thresholds. Because these thresholds are intended to support statewide GHG reduction goals, exceedance of the thresholds indicates that projected reductions in mobile-source GHG emissions would not be fully achieved and long-term increases in VMT and associated mobile-source emissions would remain the primary contributor to cumulative GHG emissions. Therefore, even with implementation of 2045 General Plan policies and Mitigation Measures GHG/mm-1.1 through GHG/mm-1.3, cumulative GHG emissions associated with long-term increases in VMT and mobile-source emissions would remain cumulatively considerable. Accordingly, cumulative impacts related to GHG emissions would be *significant and unavoidable*. See Section 4.3, *Air Quality, Greenhouse Gas Emissions, and Energy* for the full discussion of this potential impact.

5.2.2.3 Transportation

- **Impact TR-2: The project would exceed applicable thresholds of significance associated with VMT. Impacts would be significant and unavoidable (Class I).** Buildout of the proposed 2045 General Plan would generate VMT in excess of applicable thresholds of significance, resulting in a significant impact. State CEQA Guidelines Section 15064.3 identifies VMT as the appropriate measure of transportation impacts pursuant to SB 743 and allows lead agencies discretion in selecting methodologies and metrics for VMT evaluation. Consistent with this guidance, the SLOCOG Travel Demand Model (TDM) was used to estimate VMT under baseline conditions and under buildout of the 2025 and proposed 2045 General Plans. Based on recommendations from the Land Use and Climate Initiative (LUCI), general plans may result in a significant transportation impact if new residential or employment-generating land uses exceed a threshold of 15% below existing regional average VMT. Using baseline regional conditions, the applicable thresholds are 12.63 residential VMT per capita and 10.09 commute VMT per employee. The TDM results indicate that residential VMT per capita and commute VMT per employee under baseline conditions, the 2025 General Plan, and the proposed 2045 General Plan would exceed these thresholds (Central Coast Transportation Consulting 2025). Although the proposed 2045 General Plan is more VMT-efficient than the 2025 General Plan and includes extensive policies and actions to reduce VMT to the maximum extent feasible by focusing growth in more compact, multimodal, and higher-density areas, existing development patterns, the City's large geographic area, and limitations of feasible mitigation would prevent achievement of LUCI-recommended thresholds. Therefore, impacts associated with VMT under State CEQA Guidelines Section 15064.3(b) would be *significant and unavoidable*. See Section 4.14, *Transportation,* for the full discussion of this potential impact.
- **Impact TR-5: The project would result in cumulatively considerable impacts associated with VMT. Impacts would be significant and unavoidable (Class I).** Implementation of the proposed 2045 General Plan would result in cumulatively considerable impacts related to VMT, resulting in a significant and unavoidable impact. For purposes of cumulative analysis, the geographic area for VMT impacts is San Luis Obispo County, recognizing that VMT significance thresholds are established within a statewide regulatory framework intended to support achievement of statewide greenhouse gas emissions reduction goals. The cumulative VMT analysis utilized the SLOCOG TDM, which accounts for projected growth throughout the County. As demonstrated under Impact TR-2, buildout pursuant to the 2045 General Plan would improve residential and commute VMT on a per capita basis at the regional level compared to buildout of the 2025 General Plan; however, residential VMT per capita and commute VMT per employee would continue to exceed the significance thresholds recommended by the LUCI. Because these thresholds are tied to the State's

greenhouse gas reduction objectives, exceedance of the LUCI thresholds would contribute to cumulatively considerable VMT impacts at the regional and statewide levels. While the 2045 General Plan emphasizes growth in more VMT-efficient areas and includes policies and actions intended to reduce VMT to the maximum extent feasible, no feasible mitigation measures have been identified that would fully address factors contributing to the exceedance of LUCI thresholds, including the City's large geographic area and existing low-density development pattern. Therefore, cumulative impacts associated with VMT would be *significant and unavoidable*. See Section 4.14, *Transportation,* for the full discussion of this potential impact.

5.2.3 Alternatives Development and Analysis Process

In defining the feasibility of alternatives, the State CEQA Guidelines state: "Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site." If an alternative was found to be infeasible, as defined above, then it was dropped from further consideration in this analysis.

In addition, State CEQA Guidelines Section 15126.6 states that alternatives should attain most of the basic objectives of the project." As further explained by the California Supreme Court:

> [A]n EIR should not exclude an alternative from detailed consideration merely because it "would impede to some degree the attainment of the project objectives." But an EIR need not study in detail an alternative that is infeasible or that the lead agency has reasonably determined cannot achieve the project's underlying fundamental purpose.
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> Although a lead agency may not give a project's purpose an artificially narrow definition, a lead agency may structure its EIR alternative analysis around a reasonable definition of underlying purpose and need not study alternatives that cannot achieve that basic goal. (In re *Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings*, 43 Cal.4th 1143, 1165–1166 [2008]).

The alternatives selected for further analysis have been evaluated against the proposed General Plan and Zoning Code Update project to provide a comparison of environmental effects and to identify the environmentally superior alternative. Note that the significance of impacts associated with the proposed project, and the determination of impacts presented in this section for comparative purposes, are based on the respective identified changes in conditions relative to the environmental baseline (as described in Chapter 4, *Environmental Impact Analysis*).

The City has the discretion to approve (or disapprove) whatever alternative or combination of alternatives it deems most appropriate, provided that the environmental impacts of the proposed project can be mitigated, or to the extent that they cannot, provided that the City adopts a Statement of Overriding Considerations, in accordance with State CEQA Guidelines Section 15093.

The alternatives analysis includes a preliminary alternatives screening process and alternative project evaluation process, as described below.

5.2.4 Preliminary Alternatives Screening Process

The alternatives analysis begins with a screening and evaluation of a list of preliminary alternatives to determine which alternatives will be selected for further analysis in the EIR. As summarized above in Section 5.2.2, the 2045 General Plan Update and Zoning Code Update would have significant and unavoidable impacts related to air quality, greenhouse gas (GHG) emissions, and transportation. Each alternative identified in this Chapter was preliminarily assessed to determine which of the alternatives met the requirements of a viable alternative under CEQA by considering whether the alternative: 1) would be feasible; 2) would avoid or substantially lessen any of the significant effects of the project; and 3) could feasibly attain most of the basic objectives of the project. Those alternatives that met these three criteria were carried forward for more detailed review in the EIR.

5.2.5 Alternative Project Evaluation Process

The environmental impacts of the alternatives carried forward for review in the EIR, including the No Project Alternative, have been compared against the impacts of the proposed project for each environmental issue area discussed in Chapter 4, *Environmental Impacts Analysis*, of this EIR. A significance determination was made about each alternative for each issue area, and a basis for that determination has been provided. The determination of comparative impacts utilizes the following criteria:

- **No Impact:** The significance criteria do not apply, or no impact would result.
- **Similar:** Impacts would be identical or would be of the same general extent and severity as the impacts associated with the proposed project; therefore, the significance determination would be the same.
- **Increased:** New potentially significant impacts or a substantial increase in the severity of the impacts associated with the proposed project would occur; therefore, the significance determination would be greater.
- **Decreased:** Potentially significant impacts would be avoided or a substantial reduction in the severity of the impacts associated with the proposed project would occur; therefore, the significance determination would be reduced.

As a result of this evaluation and comparison of potentially significant environmental impacts, an Environmentally Superior Alternative has been identified in Section 5.5, *Environmentally Superior Alternative*.

5.3 ALTERNATIVES CONSIDERED BUT DISCARDED

State CEQA Guidelines Section 15126.6(c) requires that an EIR disclose potential alternatives that were considered and eliminated along with a brief explanation of the reason for elimination. Factors used to eliminate alternatives from detailed consideration include: (1) failure to meet most of the basic project objectives, (2) infeasibility, and/or (3) inability to avoid significant environmental impacts.

During the initial project phase, the City conducted extensive community outreach and held multiple public hearings to determine potential areas for growth to meet projected population needs and areas that could accommodate the types of businesses and industries required to achieve stable economic health. Because Atascadero cannot extend beyond our current boundaries due to topographic and infrastructure constraints, areas were identified through community and Council input where residential and commercial development could occur aligned with City goals. The community identified key areas for natural resource preservation, and those areas were excluded from greater intensity development. The community also expressed needs

for higher density housing to meet the needs of current and future residents in areas where infrastructure exists to support project feasibility. The council and community supported increased density along key corridors with more opportunities for mixed-use development and gentle density policies for existing neighborhoods adjacent to goods, services, and transit to ensure that multiple housing types could be created to support the city and State housing goals as well as support economic health and prosperity by providing housing in proximity to commercial and jobs oriented centers. Key discussion topics of the community outreach process related to residential density and appropriate locations for increased density housing. Through these community discussions, the proposed 2045 General Plan was identified to meet the housing and economic goals of the City. This extensive outreach process also resulted in the identification of a reduced density alternative, as discussed below.

5.3.1 Alternate Location

An alternate location alternative is not possible based on the nature of the proposed project consisting of a General Plan and Zoning Code Update for the City. A city's General Plan is the primary policy document that lays out the overarching vision and policies for how a city will develop and function in the future, guiding the growth and development of areas that are located within the jurisdiction of the city. Applying the proposed goals, policies, or programs of the proposed 2045 General Plan Update to a different geographic area would therefore not be feasible or meet any of the basic objectives of the City's 2045 General Plan and Zoning Code Update.

5.3.2 Reduced Density Alternative

The reduced density alternative would allow for reduced development density within the urban core compared to the densities allowed for in the 2045 General Plan and Zoning Code Update, forcing development pressure to more rural areas within and outside the City. While some areas would still be identified for increased residential density and development, this alternative would limit the number of residential areas with increased density, limiting changes to existing land use patterns in favor of development in areas in and around City limits; however, the City of Atascadero does not have opportunities for significant annexations based on the topography of the surrounding area and constraints in extending services. Accordingly, a reduced density alternative would be unable to meet the basic project objective of accommodating population growth based on historic growth estimates and anticipated State Regional Housing Needs Allocation (RHNA) over the planning period. Because a reduced density alternative would not plan for these historic and future needs, this alternative was rejected for further consideration.

5.4 ALTERNATIVES IMPACTS ANALYSIS

Criteria used to develop preliminary project alternatives included: (1) whether the alternative would avoid or substantially lessen significant impacts to air quality, GHG emissions, and/or transportation; (2) whether the alternative would generally meet the project objectives and underlying fundamental purpose; and (3) whether implementation of the alternative would be feasible. Specific project alternatives are described in further detail below.

Due to the nature of the project as a jurisdiction-wide General Plan update, alternatives involving different locations are not applicable, and a reduced density alternative would not be able to accommodate anticipated growth and State housing directives, and thus does not meet the fundamental purpose of the 2045 General Plan. The proposed 2045 General Plan accommodates future growth and development based on historic population estimates and includes additional housing potential to meet future State RHNA allocations. The proposed 2045 General Plan already incorporates the maximum feasible VMT-reducing strategies, including increased residential densities within the City's urban core, expanded bicycle and pedestrian infrastructure to provide opportunities for reduced vehicle dependence, promotion of transit use as an

alternative mode of transportation, and concentration of growth in more compact and multimodal accessible areas. The 2045 General Plan land use plan also maximizes VMT reductions by allowing for increased density within the downtown core and low-VMT producing areas of the City. The Project emphasizes supporting job-centric growth, improving the city's jobs-housing balance and increasing opportunities for reduced commuter travel. Further reductions in impacts associated with VMT, and air pollutant and GHG emissions associated with VMT and long-term mobile emissions, are constrained by factors that cannot be feasibly altered through policy, including the City's topography, existing low-density development patterns, State housing growth policies, and regional geographic context including existing job and industry centers and existing regional housing patterns. Accordingly, no additional alternatives were identified that would both substantially lessen air quality, GHG emissions, or transportation impacts and meet the basic objectives of the project, and the No Project Alternative was the only feasible alternative carried forward for detailed analysis.

5.4.1 No Project Alternative

The current City of Atascadero General Plan was adopted in 2002 and is referred to as the 2025 General Plan. The No Project Alternative would include implementation of the City's currently adopted 2025 General Plan and assumes that the proposed 2045 General Plan Update and its associated Goals, Policies, and Programs would not be adopted. Future development within the City would be consistent with the existing General Plan land use designations and zoning through the horizon year of 2045.

The No Project Alternative would assume that buildout of the City would occur in a manner that is consistent with SLOCOG's current population, housing, and employment projections for the City, including an increase in total population of approximately 2,550 residents (8.45%) between 2025 and 2060, the addition of roughly 1,975 housing units (15.77%), and growth of approximately 3,200 jobs (30.67%) (SLOCOG 2025).

Under the No Project Alternative, future development and transportation planning would continue to be guided by the 2025 General Plan, which does not incorporate the coordinated land use, mobility, infrastructure, and fiscal strategies proposed as part of the 2045 General Plan Update. Growth would be generally located in the same areas identified in the 2045 General Plan with less residential density potential and greater reliance on property redevelopment. The 2045 General Plan would place greater emphasis on directing higher-density residential and mixed-use development to Downtown and key corridors such as El Camino Real and Morro Road, supporting workforce housing near employment centers, and encouraging incremental infill development that maintains neighborhood character. The proposed plan would also strengthen policies aimed at attracting higher-wage industries through flexible land use regulations, targeted infrastructure investments, and reduced parking requirements, while prioritizing multimodal transportation improvements, complete streets, and enhanced pedestrian and bicycle connectivity to support a healthier jobs-housing balance. In addition, the 2045 General Plan would expand policies addressing emergency access and evacuation in wildfire-prone areas and integrate infrastructure planning with long-term fiscal sustainability considerations.

Under the No Project Alternative, the land uses of the 2025 General Plan would remain the same. While both the 2025 General Plan and 2045 General Plan include similar policies related to areas of higher intensity development based on the location of services and goals to maintain community character, the 2025 General Plan includes less density and fewer opportunities for housing and quality commercial development to retain the economic health of the City. The 2025 General Plan includes policies to protect and preserve the rural atmosphere of the community by assuring "elbow room" for residents by means of maintenance of large lot sizes which increase in proportion to distance beyond the Urban Core, concentrating higher density development downtown and within the Urban Core, and focusing master planned commercial uses at distinct nodes along arterial corridors. The current land use designations throughout the City would remain unchanged. The 2025 General Plan also calls for infill development

inside the Urban Services Line (USL) where services can be provided in a cost-efficient manner. Beyond the USL, the plan intends for the Rural Service Area to retain rural residential to reinforce the City's identity and maintain open space characteristics. These policies and goals are echoed in the 2045 General Plan Update, but provide for minimal growth under the 2025 General Plan, which is insufficient to meet projected housing needs and support reliable fiscal health. Specifically, the 2045 General Plan expands areas available for mixed-use and multi-family development key to meeting historic growth rates and State RHNA, in addition to supporting commercial development that offers head of household and expanded workforce opportunities to improve the jobs/housing balance.

Under the No Project Alternative, the existing Zoning Code would continue to be implemented and would maintain established public hearing and amendment procedures consistent with Government Code Section 65358(b), including limited amendment cycles and City Council review.

5.4.1.1 No Project Alternative Impact Analysis

Based on a preliminary review of the project objectives, the No Project Alternative would generally be potentially consistent with the following project objectives:

- Respect Atascadero's semi-rural character as the community evolves.
- Facilitate vibrant public spaces that encourage community connections. Support City parks, trails, and facilities that provide access to a variety of recreation experiences.
- Encourage synergistic commercial and residential uses along the El Camino Real and Morro Road corridors to support long-term viability of commercial spaces.
- Support a culture that is welcoming, inclusive, and based on mutual respect.
- Facilitate safe, convenient, and comfortable connections for people of all abilities and in different stages of life.
- Support and maintain efficient and sustainable infrastructure systems.
- Organize public service systems so that all neighborhoods and business districts have access to public services and emergency response.
- Plan and prepare for community safety and resiliency from evolving climate threats, natural, and human-caused hazards.
- Integrate Atascadero's natural, historical, and cultural landscapes and resources into planning decisions.

As discussed under Section 5.4.1 above, while both the 2025 General Plan and 2045 General Plan include similar policies related to areas of higher intensity development based on the location of services and goals to maintain community character, the 2025 General Plan includes less density and fewer opportunities for housing and quality commercial development to retain the economic health of the City. Beyond the USL, the 2025 General Plan intends for the Rural Service Area to retain rural residential to reinforce the City's identity and maintain open space characteristics. Because the 2025 General Plan does not allow for the expansion of housing opportunities and investment in commercial uses to meet projected future needs, it is insufficient to meet projected housing needs and support reliable fiscal health. Accordingly, this alternative would be potentially inconsistent with the following project objectives:

- Promote investments in downtown that support the needs of local businesses and residents and provide a quality experience for visitors.
- Create and maintain opportunities for people of all income levels and ages to live, work, raise families, and retire in Atascadero.

- Target growth to serve community needs and enhance the quality of life.
- Incentivize a mix of business and revenue streams that support a resilient economy.
- Diversify Atascadero's employment opportunities to address the needs of an evolving workforce and attract jobs for all skill levels and income ranges.

Continued implementation of the 2025 General Plan would not establish an updated community vision through 2045, nor would it provide a modernized legal and policy foundation for land use decision-making that reflects current growth conditions, State policy direction, and CEQA requirements. In addition, the No Project Alternative would not serve as a comprehensive guide for coordinated land use, circulation, environmental management, housing, infrastructure, and public health and safety planning through the 2045 horizon year, thereby limiting the City's ability to strategically address multimodal transportation, emergency preparedness, GHG reduction, and long-term fiscal sustainability. Inability to plan for potential population growth and associated fiscal challenges would limit the City's ability to adequately manage impacts and infrastructure needs.

Under the No Project Alternative, most environmental impacts would be similar to those associated with the proposed 2045 General Plan Update, with impacts associated with air quality, GHG emissions, and transportation among the issue areas that would experience increased impacts over the proposed project, as discussed further below.

5.4.1.1.1 AIR QUALITY

The 2025 General Plan includes the following goal and policies related to air quality:

Goal CIR 3: Provide and promote alternative modes of travel to reduce traffic congestion and improve air quality by providing viable transit alternatives.

- **Policy 3.1:** Promote alternatives to single-occupancy vehicle travel, particularly for commute trips.
- **Policy 3.2:** Encourage expansion of public transit as needed to meet the changing needs of the area for local and regional access, including fixed route and demand response where appropriate.
- **Policy 3.3:** Comply with the Transportation Demand Management program requirements of the San Luis Obispo County Clean Air Plan to reduce peak period trip generation.

Under the 2025 General Plan, the City's jobs-to-housing ratio was projected to worsen from a year 2015 ratio of 0.77 to a ratio of 0.71 by the year 2030 (AMBIENT 2026a). In addition, as described in detail under Section 5.4.1.1.2, *Transportation*, below, the 2025 General Plan would produce more VMT per capita and per employee than the proposed project (AMBIENT 2026a), which would be inconsistent with statewide planning and climate change policies and efforts, such as CARB's Climate Change Scoping Plan and would result in long-term increases of mobile-source air pollutants not accounted for in the SLOAPCD CAP. Therefore, under the No Project Alternative, potential impacts associated with a conflict with the SLOAPCD CAP would be anticipated to be *increased* in comparison to the proposed project.

Similar to the proposed project, the No Project Alternative would result in a cumulatively considerable increase of short-term air quality impacts and long term mobile emissions that would contribute to the region's nonattainment status for ozone. Impacts of the No Project Alternative would be anticipated to be *increased* in comparison to the proposed project, due to the No Project Alternative resulting in higher VMT per capita and per employee.

Similar to the proposed project, the No Project Alternative would facilitate development of land uses considered to be sensitive receptors, as well as new development near existing sensitive receptors. Future development associated with community buildout pursuant to the 2025 General Plan could potentially

include short-term, construction sources of TACs and long-term, operational sources of TACs, including stationary and mobile sources. Consistent with the City's current practices, future discretionary development projects associated with community buildout pursuant to the 2025 General Plan and existing Zoning Code would be evaluated for consistency with SLOAPCD's recommended guidance. In accordance with the SLOAPCD's guidance, future development projects would be evaluated for potential short-term; as well as long-term exposure to localized pollutants, including emissions of TACs and other airborne pollutants, such as asbestos, CO, and *Coccidioides* fungus spores, however, even with consistency with SLOAPCD guidance, it is conceivable that some development projects may be large enough or close enough to a sensitive receptor that applicable project-level significance thresholds would be exceeded. In the event that a significant impact is identified for an individual project, the SLOAPCD-recommended mitigation measures would be required to reduce project-related impacts; however, even with mitigation, it may not be possible to reduce potential emissions of TACs or exposure to localized airborne pollutants and all health-related risks to nearby receptors to levels below the SLOAPCD recommended significance thresholds. As a result, the No Project Alternative impacts associated with exposure of sensitive receptors to substantial pollutant concentrations would be *similar* to those of the proposed project.

Similar to the proposed project, future development associated with community buildout pursuant to the 2025 General Plan under existing Zoning Code regulations could introduce new sources of odors (both temporary and long-term) throughout the City in proximity to sensitive receptors. SLOAPCD Rule 402, Nuisance, prohibits the discharge of air contaminants or other materials, including odors, that would cause injury, detriment, nuisance, or annoyance to a considerable number of individuals. As a result, with compliance with SLOAPCD Rule 402, the 2025 General Plan and existing Zoning Code would not result in the exposure of a substantial number of people to objectionable odors. Therefore, the No Project Alternative would result in *similar* impacts to the proposed project associated with other emissions (such as those leading to odors) adversely affecting a substantial number of people.

5.4.1.1.2 GREENHOUSE GAS EMISSIONS

Similar to the proposed project, future development associated with community buildout pursuant to the 2025 General Plan would result in long-term increases in GHG emissions primarily associated with increases in motor vehicle use. To a lesser extent, energy consumption, waste generation, water use, and area sources would also be anticipated to contribute to overall increases in projected future community-wide GHG emissions under the No Project Alternative.

Under the 2025 General Plan, the City's jobs-to-housing ratio was projected to worsen from a year 2015 ratio of 0.77 to a ratio of 0.71 by the year 2030 (AMBIENT 2026a). In addition, as described in detail under Section 5.4.1.1.3, *Transportation*, below, the 2025 General Plan would produce more VMT per capita and per employee than the proposed project (AMBIENT 2026a), which would be inconsistent with LUCI recommended significance thresholds and statewide planning and climate change policies and efforts, such as CARB's Climate Change Scoping Plan. Because these thresholds are intended to support statewide GHG reduction goals, exceedance of the thresholds indicates that projected reductions in mobile-source GHG emissions would not be fully achieved. As a result, long-term increases in VMT and associated mobile-source emissions would remain the primary contributor to cumulative GHG emissions. Because VMT per capita emissions and per employee emissions would be higher than the proposed project under the No Project Alternative, environmental impacts associated with GHG emissions, conflicts with applicable GHG reduction plans, and cumulative GHG impacts would all be *increased* in comparison to the proposed project.

5.4.1.1.3 TRANSPORTATION

Without land uses that support greater residential density and focused commercial development in infill areas, the No Project Alternative will not accommodate anticipated growth and economic goals related to greater financial stability. Under the existing 2025 General Plan, future development pressure could be placed outside the USL and encroach into more rural areas of the City and surrounding county, which could result in potential conflicts with current local and regional plans and policies such as SLOCOG's regional transportation plan (RTP)/sustainable communities strategy (SCS). These local and regional plans include policies encouraging higher-density infill development, mixed land uses, and development that reduces VMT. Development under the 2025 General Plan and existing zoning framework would maintain lower residential densities and unfocused commercial redevelopment potential, resulting in a worsening jobs/housing ratio and shifting residential development pressure outside the urban core. Accordingly, environmental impacts associated with potential conflicts with applicable plans and policies related to the circulation system would be *increased* under the No Project Alternative in comparison with the proposed project.

As described in Chapter 4, Section 4.14, *Transportation*, the SLOCOG TDM was used to estimate VMT and forecast traffic levels under existing and project conditions. Table 5-1 below summarizes the 2045 General Plan's effects on regional VMT compared to existing baseline conditions and build-out conditions under the 2025 General Plan.

Table 5-1. Regional VMT Effects

Metric	Scenario (Horizon Year)		
	Baseline (2015)	**2025 General Plan Buildout (2045)**	**Proposed General Plan Buildout (2045)**
Total Regional VMT[1]	8,796,917	11,203,335	11,348,867
Population	271,859	302,069	307,885
Total Employment	115,190	135,808	138,978
Service Population (Population + Employees)	387,049	437,977	446,863
Regional VMT/Service Population	*22.73*	*25.58*	*25.40*
Residential VMT	4,040,055	4,398,052	4,474,989
Residential VMT/Population	*14.86*	*14.56*	*14.53*
Commute VMT	1,367,961	1,474,183	1,515,782
Commute VMT/Employee	*11.88*	*10.85*	*10.91*

Source: CCTC (2025).

Note:

[1] Total regional VMT reflects daily automobile VMT within the San Luis Obispo County region. Residential VMT reflects all home-based productions. Commute VMT reflects home-based work attractions.

As shown in Table 5-1, total regional VMT increases under both the 2025 General Plan and the 2045 General Plan; however, this effect generally reflects an increase in overall regional population and employment, therefore, total regional VMT does not provide a meaningful 'apples to apples' comparison between current and proposed plans. A more appropriate metric is an efficiency metric of regional VMT per service population. Service population refers to the sum of population and employment. On a regional basis, the 2045 General Plan would result in fewer regional VMT per service population than the 2025 General Plan, which indicates that the 2045 General Plan is more VMT efficient than the 2025 General Plan (CCTC 2025).

Under the No Project Alternative, continued reliance on the existing General Plan's land use framework would result in development patterns that are less supportive of transit use and alternative travel modes, such as lower multifamily and mixed-use density and a diminished focus on job centric development, thereby increasing automobile dependency and associated VMT. Although neither the No Project Alternative nor the proposed project would meet the LUCI-recommended thresholds for residential or commute VMT, the proposed 2045 General Plan Update would perform better on a regional efficiency basis by concentrating growth in areas with a greater mix of uses and travel options. Accordingly, impacts related to transportation and VMT under the No Project Alternative would be *increased* in comparison to the proposed project.

Similar to the proposed project, future development associated with community buildout under the 2025 General Plan would likely include construction of new streets and roadways within residential subdivisions and master planned commercial developments. Adherence with these existing and proposed regulations, which would be enforced through the review and entitlement process that all proposed future development would be subject to, would ensure that construction and operation of future development under the proposed General Plan would not increase hazards due to geometric design features or result in inadequate emergency access. Therefore, impacts associated with hazards due to a geometric design feature or incompatible uses and inadequate emergency access would be *similar* to the proposed project.

5.4.1.1.4 OTHER ISSUE AREAS

Future development associated with community buildout pursuant to the current 2025 General Plan would accommodate less overall development and associated growth than what would occur under the 2045 General Polan and Zoning Code Update. The 2045 General Plan anticipates residential and commercial growth consistent with historic growth rates and is responsive to the States RHNA goals, providing opportunities for growth and development within the urban core where services and multi-modal options exist and can be augmented as needs demand. Future development pursuant to the 2025 General Plan, on the other hand, would continue to follow the current development pattern throughout the City and would not provide the potential for development at higher densities within the downtown core and expanded mixed use zones within the City. Based on these characteristics, the No Project Alternative's potential impacts associated with impacts not found to be significant and unavoidable for the 2045 General Plan and Zoning Code Update are summarized below:

- **Aesthetics.** Potential impacts associated with scenic vistas, the City's visual character, and light and glare would be anticipated to be similar to those of the proposed project, *less than significant*.
- **Agriculture and Forestry Resources.** Potential impacts associated with agriculture and forestry resources would be anticipated to be similar to those of the proposed project, due to no proposed changes to existing agriculturally-zoned areas and absence of forestry resources within the City. Impacts are anticipated to be *less than significant*.
- **Biological Resources.** Potential impacts to special status species, sensitive communities, state or federally protected wetlands, migration corridors, and habitat conservation plans would be anticipated to be similar in comparison to the proposed project due to the similar level of development within the same geographic area of the proposed project. Impacts are anticipated to be *less than significant*.
- **Cultural Resources and Tribal Cultural Resources.** Potential impacts to historic resources, archaeological resources, and human remains would be anticipated to be similar to those of the proposed project, *less than significant*.

- **Energy.** Potential energy resource consumption associated with the No Project Alternative would be anticipated to be greater than the proposed project due to increases in motor vehicle use and associated fuel consumption; however, impacts would be anticipated to still be less than significant, similar to the proposed project.
- **Geology and Soils.** Potential impacts associated with geologic hazards, and unstable earth/soil conditions are anticipated to be less than significant, similar to the proposed project, due to future development generally occurring within the same geographic area. Potential impacts associated with paleontological resources are anticipated to be potentially significant, similar to the proposed project, as the 2025 General Plan does not include a policy or action that would reduce impacts to paleontological resources within the City and mitigation would be required to reduce potential impacts to *less-than-significant* levels.
- **Hazards and Hazardous Materials.** Potential impacts associated with use, storage, transport, and disposal of hazardous materials, hazards associated with accident conditions, and hazardous material cleanup sites would be anticipated to be similar to those of the proposed project, due to the similar nature of buildout of future land uses within the City, applicability of Federal, State, and local policies and regulations governing handling of hazardous materials, and buildout of uses within the same geographic area. Impacts associated with potential conflicts with emergency preparedness plans or evacuation plans would be anticipated to be similar to the project due to the increased number of residential dwellings and other uses associated with community buildout pursuant to the 2025 General Plan. Impacts are anticipated to be *less than significant*.
- **Hydrology and Water Quality.** Potential impacts associated with surface and groundwater quality, drainage patterns, flood risks, and stormwater are anticipated to be similar to the proposed project, due to future development associated with community buildout pursuant to the 2025 General Plan generally occurring within the same geographic area. Impacts are anticipated to be *less than significant*.
- **Land Use and Planning.** Potential impacts associated with land use and planning are anticipated to be potentially significant and increased in comparison to the proposed project, due to the projected worsening of the jobs/housing imbalance under the 2025 General Plan, the increase in VMT per capita and per employee, and lack of planning for anticipated growth and future RHNA, resulting in potential conflicts with the SLOCOG RTP/SCS.
- **Noise.** Potential impacts associated with Noise are anticipated to be similar to the proposed project due to future development associated with community buildout pursuant to the 2025 General Plan being subject to similar noise standards and discretionary review. Impacts are anticipated to be *less than significant*.
- **Population and Housing.** Potential impacts associated with population and housing are anticipated to be similar to the proposed project, as future development under the 2025 General Plan would not displace a significant number of people or existing housing, and would not result in substantial unplanned population growth. Impacts are anticipated to be *less than significant*.
- **Public Services and Recreation.** Potential impacts associated with public services and recreation are anticipated to be similar to those of the proposed project due to future development associated with community buildout pursuant to the 2025 General Plan occurring within the same geographic area and having similar impacts to public service systems and recreation facilities. Impacts are anticipated to be *less than significant*.
- **Utilities and Service Systems.** Potential impacts associated with utilities and service systems are anticipated to be similar to those of the proposed project due to future development associated with community buildout pursuant to the 2025 General Plan occurring within the same geographic area

and having similar impacts to public service systems and recreation facilities. Impacts are anticipated to be *potentially significant*.

- **Wildfire.** Potential impacts associated with wildfire are anticipated to be similar to those of the proposed project, due to the level of future development associated with community buildout pursuant to the 2025 General Plan occurring within the same geographic area and similar applicability of State and local regulations, such as the California Fire Code and City building code regulations. Impacts are anticipated to be *less than significant*.

5.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The State CEQA Guidelines require an analysis of alternatives to identify an environmentally superior alternative among the alternatives evaluated in the EIR. The environmentally superior alternative is the alternative that would minimize adverse impacts to the environment. Table 5-1 presents a comparison of the potential environmental impacts associated with each alternative evaluated in this EIR.

Table 5-2. Comparison of Impacts Among Alternatives

Issue Area	No Project Alternative
Aesthetics	Similar
Agriculture	Similar
Air Quality	Increased
Biological Resources	Increased
Cultural Resources	Similar
Energy	Increased
Geology and Soils	Similar
Greenhouse Gas Emissions	Increased
Hazards and Hazardous Materials	Similar
Hydrology and Water Quality	Similar
Land Use and Planning	Increased
Mineral Resources	Similar
Noise	Similar
Population and Housing	Similar
Public Services	Similar
Recreation	Similar
Transportation and Traffic	Increased
Tribal Cultural Resources	Similar
Utilities and Service Systems	Similar
Wildfire	Similar
Meets Project Objectives?	No

Based on the analysis provided above, no feasible alternatives were identified that would reduce any of the significant, unavoidable impacts that would result from the proposed project, and the No Project Alternative would not meet the project's basic objectives. Therefore, the proposed project is the environmentally superior alternative.